

Comments in the matter of WT Docket 05-157 (FCC 05-80)

Section 7502(a) of the "Act"

An additional allocation of spectrum in the 700 MHz band is indeed needed to meet the present and future needs of emergency response providers. The new allocation should be made available in a timely manner. Other spectrum allocated in 700 MHz for emergency response providers may not be available for some period of time, pending the clearing of TV stations authorized there. In making this new allocation, it is recommended that the future wide-band/broadband needs be addressed by providing the channel spacing needed to support these high bandwidth requirements. The wideband/broadband needs include: data, real time video and high-resolution images.

Section 7502(c)(1)

In the matter of the operation and administration of a nationwide interoperable broadband mobile communications network:
Several considerations should be fully and carefully investigated to achieve the desired objective of interoperable communications. These include 1) economic design, 2) technical design and 3) accountability of operation.

* Economic design- Based on Open standards (i.e. no Intellectual Property Rights (IPR), patents, or royalties). This is necessary to foster competition to arrive at the availability of affordable choices from multiple vendors. Standards, which include IPR, will provide few choices of equipment for the emergency response providers and will result in a very low adoption rate by emergency response providers. Doing so would be counter-productive to reaching the objective of interoperable communications.

* Technical design- Should be designed as a noise-limited rather than a interference- limited system.
As with any communications system designed as interference-limited, such as cellular- type systems, there is a noticeable increase in the density of the required infrastructure.

This translates into moderate to considerable increases in procurement, construction, operation and maintenance costs. The resulting design would not be affordable to many smaller or rural emergency response providers, thereby defeating the objective to provide interoperable communications.

3)Accountability of operations- Great care must be taken here.
Accountability to the emergency response providers the system is to benefit would

be required. Accountability in commercial operations is generally to the stockholders or investors. Accountability in this fashion would not be in the best interest of emergency response providers.

Section 7502(c)(2)

Commercial wireless technologies are suitable for the general public, consumer and some secondary Public Safety communications needs. Dedicated systems designed with the flexibility and features needed by Public Safety provide the coverage and reliability required by these users. Mission critical communications are required in the mission critical work environment.